



July 11, 2012

**VIA CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mayor Garrad Marsh  
Greg Nyhoff, City Manager  
Dennis Turner, Director of Public Works  
City of Modesto  
1010 10th Street  
Modesto, CA 95354

Gary DeJesus, Deputy Director of Public Works  
Department  
Robert Englent, Wastewater Collections Manager  
Wastewater Administration  
Primary Plant  
1221 Sutter Ave.  
Modesto, California 95351

**Re: Notice of Violation and Intent to File Suit Under the Clean Water Act**

Dear Mayor Marsh and Messrs. Nyhoff, Turner, DeJesus, and Englent:

I am writing on behalf of California Sportfishing Protection Alliance ("CSPA") in regard to violations of the Federal Water Pollution Control Act, 33 U.S.C. §§ 1251 *et seq.* ("Clean Water Act" or "CWA") caused by the City of Modesto's ("City" or "Modesto") failure to comply with the terms and conditions of (1) *Waste Discharge Requirements for the City of Modesto Water Quality Control Facility Stanislaus County*, Order No. R5-2012-0031, NPDES No. CA0079103 ("2012 NPDES Permit"); (2) *Waste Discharge Requirements for the City of Modesto Water Quality Control Facility Stanislaus County*, Order No. R5-2008-0059, NPDES No. CA0079103 ("2008 NPDES Permit"); (3) *Waste Discharge Requirements for the City of Modesto Water Quality Control Facility Stanislaus County*, Order No. 5-01-120, NPDES No. CA0079103 ("2001 NPDES Permit") (the 2012 NPDES Permit, the 2008 NPDES Permit and the 2001 NPDES Permits are referred to collectively as the "NPDES Permits"); (4) *Waste Discharge Requirements City of Modesto Storm Water Discharge from Municipal Separate Storm Sewer System Stanislaus County*, Order No. R5-2002-0182, NPDES Permit No. CAS083526, California Regional Water Quality Control Board Central Valley Region ("the 2002 MS4 Permit"); and (5) *Waste Discharge Requirements City of Modesto Storm Water Discharge from*

*Municipal Separate Storm Sewer System Stanislaus County*, Order No. R5-2008-0092, NPDES Permit No. CAS083526, California Regional Water Quality Control Board Central Valley Region ("the 2008 MS4 Permit") (the 2002 MS4 Permit and 2008 MS4 Permit are referred to collectively as the "MS4 Permits").

As required by the Clean Water Act, CSPA puts Modesto on formal notice that, after the expiration of sixty (60) days from the date of this Notice of Violation and Intent To File Suit Letter ("Notice Letter"), CSPA intends to file suit in Federal District Court pursuant to Section 505(a) of the Clean Water Act, 33 U.S.C. §1365(a), against Modesto for the violations described in this Notice Letter.

Section 505(b) of the Clean Water Act, 33 U.S.C. § 1365(b), requires that sixty (60) days prior to the initiation of a civil action under Section 505(a) of the Clean Water Act, 33 U.S.C. § 1365(a), a citizen must give notice of his/her intention to file suit. Notice must be given to the owner or managing agent of the facility responsible for the violations, the Administrator of the United States Environmental Protection Agency ("EPA"), the Regional Administrator of the EPA, and the Executive Officer of the State of California's State Water Resources Control Board ("State Board"). See 40 C.F.R. § 135.2.

CSPA intends on filing suit to seek injunctive relief pursuant to CWA Sections 505(a) and (d), 33 U.S.C. §1365(a) and (d), declaratory relief, and such other relief permitted by law to remedy the CWA violations outlined below. CSPA will also seek civil penalties pursuant to Section 309(d) of the Clean Water Act, 33 U.S.C. § 1319(d), and the EPA Regulation, Adjustment of Civil Monetary Penalties for Inflation, set forth at 40 C.F.R. § 19.4 (2009). These provisions authorize civil penalties for each separate violation of the Clean Water Act occurring prior to January 12, 2009 of up to \$32,500 per day per violation, and \$37,500 per day per violation for all Clean Water Act violations occurring after January 12, 2009. Finally, CSPA will seek to recover its litigation costs, including attorneys' and experts' fees, pursuant to CWA Section 505(d), 33 U.S.C. § 1365(d).

## **I. ORGANIZATION GIVING NOTICE OF CLEAN WATER ACT VIOLATIONS**

CSPA is a 501(c)(3) non-profit public benefit conservation and research organization. CSPA was established in 1983 for the purpose of conserving, restoring, and enhancing the state's water quality, wildlife and fishery resources, aquatic ecosystems and associated riparian habitats. CSPA accomplishes its mission by actively seeking federal, state, and local agency implementation of environmental regulations and statutes and routinely participates in administrative, legislative and judicial proceedings. When necessary, CSPA directly initiates enforcement actions on behalf of itself and its members to protect public trust resources. CSPA's office is located at 3536 Rainier Avenue, Stockton, California 95204.

CSPA's members use and enjoy the San Joaquin River, Tuolumne River, Dry Creek, their tributaries, and the waters in and around the Sacramento-San Joaquin River Delta (the "Delta") for fishing, boating, swimming, bird watching, picnicking, viewing wildlife, and engaging in scientific study. Information available to CSPA indicates that Modesto discharges raw and/or inadequately treated sewage into the Tuolumne River and Dry Creek, waters that are tributary to the San Joaquin



River, which flows to the Delta. These discharges of sewage and associated pollutants degrade water quality and harm aquatic life in these waters, and thus impair CSPA's members' use and enjoyment of the waters. Further, Modesto's discharges of raw and/or inadequately treated sewage are ongoing and continuous. As a result, CSPA's members' use and enjoyment of these waters has been and continues to be adversely impacted by the discharges of sewage to waters used and enjoyed by CSPA's members.

## **II. THE ENTITY RESPONSIBLE FOR THE ILLEGAL DISCHARGES**

Information available to CSPA indicates that Modesto provides wastewater collection, treatment, and disposal services to residents and business in the City of Modesto, the community of Empire, and a portion of the City of Ceres. Modesto's Water Quality Control Division within the Public Works Department is responsible for the day-to-day operation and maintenance of the sewage collection system ("Collection System"), which is owned and operated by Modesto. The City's Wastewater Division maintains an office at 1221 Sutter Avenue, Modesto, California 95351. Among other things, Modesto is responsible for operating and maintaining the Collection System, including: preventing illicit discharges into the Collection System; properly designing and constructing sewers and connections; inspecting and repairing mainline sewer pipes; inspecting and repairing laterals owned or maintained by the City; limiting the discharge of fats, oils, and grease and other debris into the Collection System; and enforcing violations of its ordinances regarding discharges to its Collection System.

Information available to CSPA further indicates that the City owns and operates a municipal separate storm sewer system ("MS4"), which provides storm water drainage in Modesto. The City's Wastewater Division within the Public Works Department also is responsible for the day-to-day operation and maintenance of the MS4. The City Manager is responsible for the operations of Modesto's government. The Mayor is a member of the City Council, presiding officer over all City Council meetings, authorized to sign legal documents on behalf of the City, and represents the City on local, state, and national levels.

## **III. THE COLLECTION SYSTEM, THE WASTEWATER TREATMENT PLANT, AND THE CITY'S NPDES PERMITS**

The City of Modesto is a municipality incorporated under the laws of the State of California. The City owns and operates the Collection System, which consists of 3.6 miles of pressure sewer and 651.9 miles of gravity sewer. Modesto provides sewage collection and treatment services for approximately 224,000 people, including the City of Modesto, the community of Empire, and a portion of the City of Ceres. The Collection System consists of pipes and other manmade conveyances, and is a point source under the Clean Water Act. *See* 33 U.S.C. § 1362(14). The Collection System collects and conveys sewage in the City's service area to the City of Modesto's Water Quality Control Facility ("Facility"). The Facility consists of separate primary and secondary treatment plants. Clarified effluent from the primary treatment plant, located at 1221 Sutter Avenue in the City of Modesto, is transported 6.5 miles southwest to the secondary treatment plant, located at 7007 Jennings Road in Modesto. Effluent from the secondary treatment plant is ultimately transferred to one of two storage



ponds after which it is either discharged to the San Joaquin River or applied to land owned by the discharger.

In 2001, the City obtained a permit pursuant to the Clean Water Act (the 2001 NPDES Permit), which authorizes it to discharge pollutants from the storage ponds to the San Joaquin River subject to certain terms and conditions. For example, effluent can only be discharged from the storage ponds into the San Joaquin River between October 1 and May 31, and only when the flow in the River is high enough to assure a dilution of 20:1 (receiving water: effluent flow). *See* 2001 NPDES Permit, Discharge Prohibitions, §§ A.1 and A.2 and Findings, Nos. 4-5 and 7-8. This prohibition was carried over in the 2008 NPDES Permit. *See* 2008 NPDES Permit, Discharge Prohibitions, § III.E. It was then carried over in the 2012 NPDES Permit. *See* 2012 NPDES Permit, Discharge Prohibitions, § III.E. The 2012 NPDES Permit also contains strict prohibitions regarding discharges from the City's sewage infrastructure, which includes the Collection System. 2012 NPDES Permit, § III.A and Attachment E (Monitoring and Reporting Program), § X.D.3. These provision are mirrored in the 2008 NPDES Permit. 2008 NPDES Permit, § III.A and Attachment E (Monitoring and Reporting Program), § X.D.3. The 2001 NPDES Permit likewise prohibited any discharge other than at the single, authorized discharge point. 2001 NPDES Permit, § A.2. The 2001 NPDES Permit and the 2008 NPDES Permit also prohibited, and the 2012 NPDES Permit now prohibits, the bypass or overflow of waste to surface waters. 2001 NPDES Permit, § A.3; 2008 NPDES Permit, § III.B; 2012 NPDES Permit, § III.B.

Modesto operates and manages its Collection System improperly, resulting in sewer system overflows ("SSOs") of raw and/or inadequately treated sewage. According to reports submitted by Modesto to the State Board and the Regional Water Quality Control Board for the Central Valley Region ("Regional Board"), the City has spilled raw and/or inadequately treated sewage from its Collection System on at least 310 separate occasions in the last 5 years. Attached hereto as Exhibit A is a table that lists the date and location of the 310 reported SSOs.<sup>1</sup> In total, the City spilled at least 411,231.5 gallons of sewage, and reported that 195,793 gallons of sewage reached surface waters. The City's ongoing and continuous SSOs are violations of the CWA and demonstrate serious problems with the City's operation and maintenance of its Collection System.

#### **IV. THE CITY'S MS4 AND ITS OBLIGATIONS UNDER THE CLEAN WATER ACT TO KEEP SEWAGE OUT OF THE MS4**

The Modesto-owned and operated MS4 provides storm water drainage for the residents and businesses of Modesto in the same areas served by the Collection System. An MS4 is a system of ditches, man-made channels, catch basins and/or storm drains owned or operated by a State, city, or town that is designed or used for collecting or conveying storm water and that discharges to waters of the United States.<sup>2</sup> *See* 40 C.F.R. § 122.26(b)(8)(i)-(ii); *see also* 40 C.F.R. § 122.26(b)(18). The City charges single-family residential plots \$3.23 per month (for property lots between 3,501 and 7,000

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<sup>1</sup> Exhibit A lists the SSOs the City reported in the last 5 years in SSO reports submitted to the State and Regional Board, in the District's internal SSO reports, and in other correspondence to and from the City indicating SSOs from its Collection System.

<sup>2</sup> An MS4 is further defined as a sewer system that is not a combined sewer, and is not part of a Publicly Owned Treatment Works. *See* 40 C.F.R. § 122.26(b)(8)(iii)-(iv).



square feet) and commercial users \$37.50 per month (for property sizes of 20,000 square feet) to provide storm water drainage services.

Modesto's MS4 consists of 77 miles of storm drain lines and 20 pump stations, as well as the streets, curbs, gutters, other paved surfaces, and rock wells in the City. Storm water is discharged to either detention/retention basins, receiving waters (either Tuolumne River or Dry Creek), Modesto Irrigation District ("MID") laterals/drains, or rock wells. Twenty percent of the city area, covering approximately 6,650 acres of the urban area, drains directly to surface waters. Of this drainage, 33% drains to the Tuolumne River, 54% to Dry Creek, and 13% to Modesto Irrigation Canals.

Clean Water Act section 402(p), 33 U.S.C. § 1342(p), establishes a framework for regulating municipal storm water discharges under NPDES Permits. Section 402(p) of the CWA requires dischargers of municipal storm water to obtain and comply with an NPDES permit. *See* 33 U.S.C. § 1342(p). Section 402(p)(3)(B) of the CWA sets forth the requirements that must be in all MS4 permits, including requirements that prohibit discharges into the storm sewers and reduce pollutants in discharges to receiving waters. 33 U.S.C. § 1342(p)(3)(B). In 1994, Modesto was first issued the MS4 Permit. The City's permit was re-issued in 2002 and 2008. Pursuant to the MS4 Permit, the City is required to effectively prohibit the discharge of non-storm water into its MS4. *See* 2008 MS4 Permit, Discharge Prohibitions, B.1; 2002 MS4 Permit, Discharge Prohibitions, B.1.

The sewage spilled from the City's Collection System is non-storm water. Thus, when this sewage flows to the City's MS4, it is a discharge of non-storm water to the MS4. Of the 301 SSOs reported in the past five (5) years, the City reported that 275 reached the storm drains, streets, curbs, gutters, rock wells and paved surfaces that make up the City's MS4. The numerous, repeated, and ongoing discharges of SSOs to the MS4 evidence a failure by the City to effectively prohibit the discharge of non-storm water in the form of SSOs to the MS4. The City's failure is due in part to the improper management and operation of the Collection System, and in part to the inadequate management and operation of the MS4. For example, the City's Storm Water Management Program ("SWMP") does not contain adequately developed or implemented measures to effectively prohibit non-storm water discharges to the MS4.

## **V. THE LOCAL WATERWAYS RECEIVING THE ILLEGAL DISCHARGES OF POLLUTANTS AND THE ENVIRONMENTAL IMPACTS FROM THOSE DISCHARGES**

### **A. The Receiving Waters**

SSOs from Modesto's Collection System reach the San Joaquin River, Tuolumne River, Dry Creek, and their tributaries (collectively "Receiving Waters"). Modesto's MS4 also discharges to these Receiving Waters. Dry Creek flows into the Tuolumne River which flows into the San Joaquin River, which flows to the Sacramento-San Joaquin Delta, and eventually to San Francisco Bay. The Sacramento-San Joaquin Delta, along with the San Francisco Bay, forms the largest estuary on the west coast of North America. The Sacramento-San Joaquin Delta is a 1,600-square mile area of channels and islands at the confluence of the Sacramento and San Joaquin Rivers. Water that is not diverted from the Delta to municipal and agricultural uses flows through to the San Francisco Bay



Estuary. The Delta provides habitat to many species of aquatic wildlife, including multiple federally and state protected fish species. The San Joaquin River and its tributaries provide habitat for aquatic species, as well as opportunities for wildlife viewing, fishing, and other water-related recreation such as swimming, wading and kayaking.

According to the State of California, the beneficial uses of the San Joaquin River (mouth of the Merced River to Vernalis segment) include contact and non-contact water recreation (such as fishing), wildlife habitat, agricultural water supply and stock watering, warm habitat spawning, migration of aquatic organisms for warm and cold water habitats, and warm freshwater aquatic habitat.<sup>3</sup> Beneficial uses of the Tuolumne River (New Don Pedro Dam to San Joaquin River segment) include contact and non-contact water recreation (such as fishing), wildlife habitat, agricultural water supply and stock watering, warm and cold habitat spawning, migration of aquatic organisms for cold water habitats, and warm and cold freshwater aquatic habitats.

The San Joaquin River in the Modesto area is listed on the State of California's 2010 Clean Water Act Section 303(d) list of impaired water bodies as impaired for boron, selenium, electrical conductivity, chlorpyrifos, diazinon, DDT, Group A pesticides, mercury, temperature, and unknown toxicity.<sup>4</sup> Dry Creek is impaired for chlorpyrifos, diazinon, E. coli, and unknown toxicity. The Tuolumne River in the Modesto Area is impaired for chlorpyrifos, diazinon, Group A pesticides, temperature, and unknown toxicity. Many of the pollutants found in raw and inadequately treated sewage are toxic. By discharging raw and/or inadequately treated sewage and its associated pollutants to waters of the United States in violation of the Clean Water Act, the City has contributed, and continues to contribute to the impairment of Dry Creek, the Tuolumne River and the San Joaquin River. As such, the City's violations of the Clean Water Act directly harm CSPA's members' use and enjoyment of the Receiving Waters.

#### **B. Pollutants in Sewage and Their Impacts to the Environment and Human Health**

Raw and/or inadequately treated sewage harms the Receiving Waters and poses a serious risk to fisheries, wildlife habitat, and human health. Sewage contains human waste, viruses, protozoa, mold spores and bacteria. In addition, raw and/or inadequately treated sewage contains chemicals that cause cancer or reproductive toxicity. These chemicals come from solvents, detergents, cleansers, inks, pesticides, paints, pharmaceuticals, and other chemicals used by households and businesses and then discarded to sewage collection systems.<sup>5</sup> High concentrations of these pollutants are typically found in

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<sup>3</sup> See Water Quality Control Plan, Sacramento and San Joaquin River Basins (Region 4), Chapter 2.

<sup>4</sup> See [http://maps.waterboards.ca.gov/webmap/303d/files/2010\\_USEPA\\_approv\\_303d\\_List\\_Final\\_122311wsrscs.xls](http://maps.waterboards.ca.gov/webmap/303d/files/2010_USEPA_approv_303d_List_Final_122311wsrscs.xls). A water body that is listed as impaired cannot support its designated beneficial uses.

<sup>5</sup> See People for Puget Sound, "Puget Sound Georgia Basin Sewage Report," February 1995; see also Excerpt from "Safe Substitutes at Home: Non-Toxic Household Products," Gary A. Davis and Em Turner, University of Tennessee-Knoxville Waste Management Institute, [es.epa.gov/techinfo/facts/safe-fs.html](http://es.epa.gov/techinfo/facts/safe-fs.html); see also Frick, E., et al, Presence of Pharmaceuticals in Wastewater Effluent and Drinking Water, Metropolitan Atlanta, Georgia July- September 1999, Proceedings of the 2001 Georgia Water Resources Conference, March 26-27, 2001.



raw and/or inadequately treated sewage. SSOs from the City's Collection System result in the addition of these pollutants to the City's MS4 and to the Receiving Waters.

SSOs and discharges of inadequately treated effluent also affect people who eat fish caught in the Receiving Waters. Toxic chemicals bio-accumulate in the Receiving Waters' food web; i.e., contaminants absorbed by plankton accumulate in fish and birds farther up the food chain, and ultimately transfer to human consumers. Contamination of fish is particularly harmful to people who eat an above-average amount of local fish.

SSOs that do not reach the Receiving Waters, but instead discharge to public streets, public buildings and grounds, private yards or homes, also pose significant health risks. For example, exposure to raw and/or inadequately treated sewage can cause a variety of health problems, including gastroenteritis, respiratory illness, ear, nose, and throat problems, and skin rashes. Mold spores can establish an ecological niche when they are carried onto a homeowner's property after contact with an SSO, creating an ongoing health risk from chronic exposure. SSOs also diminish property values and impose severe nuisance on local residents.

#### **VI. THE CITY'S DISCHARGES OF SSOs FROM THE COLLECTION SYSTEM VIOLATE ITS NPDES PERMITS**

The Clean Water Act requires that all regulated dischargers comply with the terms and conditions of their NPDES permit. *See* 33 U.S.C. §§ 1311(a), 1365. Any violation of the 2001 NPDES, the 2008 NPDES Permit, or the 2012 NPDES Permit is an enforceable violation of the Clean Water Act. 33 U.S.C. § 1365(f). The City's NPDES Permits prohibit the discharge of wastewater, including SSOs, from the Collection System. *See* 2012 NPDES Permit § III.A ("Discharge of wastewater at a location or in a manner different from that described in the Findings is prohibited"), § III.B ("The by-pass or overflow of wastes to surface waters is prohibited"), and Attachment E (Monitoring and Reporting Program) § X.D.3 ("Sanitary sewer overflows are prohibited by this order"); 2008 NPDES Permit § III.A ("Discharge of wastewater at a location or in a manner different from that described in the Findings is prohibited"), § III.B ("The by-pass or overflow of wastes to surface waters is prohibited"), and Attachment E (Monitoring and Reporting Program) § X.D.3 ("Sanitary sewer overflows are prohibited by this order"); 2001 NPDES Permit § A.2 and A.3 ("The by-pass or overflow of wastes to surface waters is prohibited"). Modesto has violated and continues to violate these provisions by discharging SSOs from the Collection System. At a minimum, the City violated the 2012 NPDES Permit, the 2008 NPDES Permit, and the 2001 NPDES Permit on the dates set forth in Exhibit A (identifying 301 SSOs).

CSPA believes that additional information will be discovered that indicates Modesto has not reported each and every SSO from the Collection System or has misreported SSOs occurring within the last five (5) years. Moreover, CSPA believes that the City lacks an adequate monitoring program to detect, report, and address SSOs and their impacts. Thus, CSPA believes that SSOs in addition to those identified in Exhibit A will be discovered through this enforcement action. CSPA puts Modesto on notice that all SSOs from the Collection System occurring in the last five (5) years, whether specifically reported or not, as well as any future violations, will be included in this litigation.



Each day between July 11, 2007, and April 25, 2008, that Modesto has discharged raw and/or inadequately treated sewage from the Collection System is a separate and distinct violation of Sections A.2 and A.3 of the City's 2001 NPDES Permit and the Clean Water Act. Each day between April 25, 2008, and June 6, 2012, that Modesto has discharged or continues to discharge raw and/or inadequately treated sewage from the Collection System is a separate and distinct violation of Sections III.A and III.B of the City's 2008 NPDES Permit and the Clean Water Act. Each day since June 7, 2012, that Modesto has discharged or continues to discharge raw and/or inadequately treated sewage from the Collection System is a separate and distinct violation of Sections III.A and III.B of the City's 2012 NPDES Permit and the Clean Water Act. The City's violations will continue each day it discharges SSOs in violation of the requirements of its 2012 NPDES Permit and the Clean Water Act. Modesto is subject to penalties for all violations of the NPDES Permits and the Clean Water Act occurring in the five (5) years prior to the date of this Notice Letter.

## **VII. THE CITY'S DISCHARGES OF SSOs TO ITS MS4 VIOLATE ITS MS4 PERMITS**

As explained above, the Clean Water Act requires permittees to comply with all terms and conditions of their NPDES permits, and a violation of an NPDES permit is an enforceable violation of the Clean Water Act. *See* 33 U.S.C. §§ 1311(a), 1365. The MS4 Permits contain prohibitions and limitations on the discharge of pollutants into Modesto's MS4. Discharge Prohibition B.1 of both of the MS4 Permits require Modesto to effectively prohibit discharges of non-storm water into the MS4.<sup>6</sup> Modesto has violated and continues to violate these provisions by failing to effectively prohibit the discharge of SSOs from the Collection System into the MS4.

Modesto has discharged SSOs from its Collection System into the MS4 on at least 275 separate occasions in the past five (5) years. *See* Exhibit B attached hereto (identifying dates and locations of SSOs that entered the MS4).<sup>7</sup> As a result, Modesto has violated and continues to violate Discharge Prohibition B.1 of the MS4 Permits as well as the Clean Water Act. At a minimum, Modesto violates Discharge Prohibition B.1 of the MS4 Permits and the Clean Water Act every time an SSO from the Collection System enters the MS4.

CSPA believes that additional information will be discovered that indicates Modesto has not reported each SSO from the Collection System that has entered the MS4 in the past (5) five years. CSPA puts Modesto on notice that each discharge of an SSO into Modesto's MS4 during the past five (5) years, whether specifically reported or not, will be included in this enforcement action. CSPA will include additional violations when information becomes available.

Each day between July 11, 2007, and June 12, 2008, that Modesto has failed to effectively prohibit non-storm water discharges in the form of SSOs to the MS4 is a separate and distinct violation of the 2002 MS4 Permit and the Clean Water Act. Each day since June 12, 2008, that Modesto has failed and continues to fail to effectively prohibit non-storm water discharges in the form of SSOs to

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<sup>6</sup> While there are certain exceptions to this prohibition, none of them pertain to SSOs.

<sup>7</sup> Exhibit B sets forth the SSOs Modesto reported to the State Board and Regional Board as reaching the storm drain pipes, channels, ditches, streets, curbs, gutters, other paved surfaces, and rock wells of its MS4.



the MS4 is a separate and distinct violation of the 2008 MS4 Permit and the Clean Water Act.<sup>8</sup> Modesto's violations of Discharge Prohibition B.1 of the MS4 Permits are ongoing and continuous. Modesto's violations will continue every day and/or occasion it fails to effectively prohibit non-storm water discharges in the form of SSOs to the MS4 in violation of the requirements of the 2008 MS4 Permit and the Clean Water Act. Modesto is subject to penalties for all violations of the MS4 Permits and Clean Water Act occurring during the past five (5) years.

### VIII. CONCLUSION

CSPA has retained legal counsel to represent it in this matter. Please direct all communications to Lozeau Drury LLP at the address/number below:

Michael Lozeau  
Douglas Chermak  
Lozeau Drury LLP  
410 12th St., Suite 250  
Oakland, CA 94607  
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michael@lozeaudrury.com  
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drev@lawyersforcleanwater.com

Upon expiration of the 60-day notice period, CSPA will file a citizen suit enforcement action pursuant to Section 505(a) of the Clean Water Act, 33 U.S.C. § 1365(a), for the above-referenced violations. During the 60-day notice period, however, CSPA is willing to discuss effective remedies for the violations noted in this letter. If Modesto wishes to pursue such discussions prior to the initiation of litigation, we suggest that it initiate those discussions immediately.

Sincerely,



Bill Jennings, Executive Director  
California Sportfishing Protection Alliance

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<sup>8</sup> At a minimum, Modesto violates Discharge Prohibition B.1 of the 2008 MS4 Permit and the Clean Water Act every time an SSO from the Collection System enters the MS4.



**SERVICE LIST**  
**(via registered mail, return receipt requested)**

Lisa Jackson  
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Tom Howard  
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State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Susana Alcala Wood  
City Attorney  
City of Modesto  
1010 10th Street  
Modesto, CA 95354

Jared Blumenfeld  
Regional Administrator  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, California, 94105

Pamela Creedon  
Executive Officer  
Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, California, 95670-6114



Exhibit A  
Page 1 of 7

SSO Event ID	State Date	Location
unknown	July 2, 2007	345 Morton Avenue
unknown	July 23, 2007	1500 Phoenix Avenue
unknown	July 28, 2007	3805 Towery Avenue
656836	September 1, 2007	1010 Amherst Avenue
657068	September 9, 2007	1330 Princeton Avenue
657867	September 17, 2007	905 Hammond Street
704524	September 23, 2007	712 Tuolumne Blvd.
704469	September 26, 2007	518 Washington Street
unknown	September 27, 2007	4204 Vivian Drive
706022	October 4, 2007	Madison 617 Street
706787	October 24, 2007	2804 Hemminger Way
706776	October 28, 2007	602 Muir Road
707993	October 29, 2007	1901 Carver Road
708348	November 1, 2007	1513 Peppertree Lane
707485	November 5, 2007	436 McClure Road
707996	November 8, 2007	160 Mark Randy Place
707989	November 12, 2007	1417 Madrone Drive
708336	November 22, 2007	601 Duncan Avenue
708345	November 25, 2007	2017 Westview Court
708875	November 30, 2007	1820 Serena Avenue
708876	December 2, 2007	2105 Cheyenne Way
709621	December 3, 2007	1800 Joann Avenue
708988	December 4, 2007	1920 Cindy Avenue
710475	December 13, 2007	109 River Road
710476	December 14, 2007	509 Scenic Drive
710184	December 20, 2007	1310 Muirswood Way
710182	December 20, 2007	1812 Landini Way
710185	December 20, 2007	1804 Kruger Way
710479	December 24, 2007	2017 Girard Avenue
710483	December 25, 2007	1513 Roosevelt Way
710485	December 26, 2007	109 River Road
710484	December 26, 2007	437 Enslen Park Court
756693	January 1, 2008	1212 Valeriewood Way
756694	January 2, 2008	2517 Olympus Court
unknown	January 4, 2008	3200 Kathy Avenue
756831	January 4, 2008	1137 Lillian Drive
756832	January 4, 2008	1209 Ojai Lane
756833	January 4, 2008	3601 Woodbine Drive
756835	January 4, 2008	3409 Woodbine Drive
711386	January 7, 2008	2100 Standiford Avenue
756695	February 4, 2008	600 Paradise Road
712822	February 10, 2008	500 La Loma Ave Avenue
712826	February 10, 2008	301 El Rio Avenue
713199	February 15, 2008	2025 Celeste Drive
713092	February 18, 2008	1500 Stetson Avenue
714096	February 26, 2008	1420 Chapala Way



SSO Event ID	State Date	Location
714112	February 26, 2008	1417 Chapala Way
714118	February 26, 2008	2320 Tampico Court
715240	March 3, 2008	2513 Hemminger Way
756697	March 17, 2008	1606 Cindi Avenue
756748	March 17, 2008	1712 Silverwood Avenue
756750	March 17, 2008	1900 Silverwood Avenue
715699	March 26, 2008	1321 Magolia Avenue
unknown	March 31, 2008	2213 Peppermint Dr / 1112 Hilo Lane
756773	March 31, 2008	2213 Peppermint Drive
756774	March 31, 2008	1112 Hilo Lane
716087	March 31, 2008	1544 Ardmore Avenue
716445	April 2, 2008	1928 Cindy Avenue
716072	April 8, 2008	2043 Celeste Drive
716083	April 8, 2008	2045 Celeste Drive
716086	April 8, 2008	1904 Sage Court
716136	April 11, 2008	925 Enslin Avenue
716443	April 18, 2008	546 High Street
756768	April 25, 2008	1920 Lafayette Avenue
716927	May 1, 2008	116 Athens Avenue
756767	May 5, 2008	2617 Jennifer Drive
unknown	May 6, 2008	1340 McHenry Avenue
756765	May 8, 2008	405 Elmwood Avenue
717537	May 15, 2008	929 Roselawn Avenue
718132	May 24, 2008	1120 Ojai Lane
718133	May 24, 2008	1212 Ojai Lane
718130	May 25, 2008	920 Virginia Avenue
718136	May 26, 2008	1816 Bonanza Way
756770	June 1, 2008	3032 Darlene Lane
756769	June 1, 2008	1301 Satariano Lane
719112	June 7, 2008	807 High Street
719279	June 9, 2008	141 Morton Blvd.
724074	June 27, 2008	2200 San Lucas Court
721564	July 4, 2008	1404 Roosevelt Avenue
722496	July 9, 2008	2509 Springflower Way
722505	July 12, 2008	2904 Debbie Lane
756772	July 16, 2008	3708 Coffee Road
724891	July 19, 2008	620 El Camino Drive
756686	August 4, 2008	2309 Rivera Drive
724577	August 6, 2008	2021 Standiford Avenue
724767	August 14, 2008	126 Modesto Avenue
726021	September 7, 2008	1307 Fordham Avenue
727421	October 1, 2008	225 El Rio Avenue
728227	October 17, 2008	1525 McHenry Avenue
728558	October 18, 2008	1816 Landini Way
728559	October 18, 2008	1804 Kruger Drive
729022	November 4, 2008	816 Wright Street



SSO Event ID	State Date	Location
729203	November 1, 2008	160 Mark Randy Place
729209	November 10, 2008	140 Mark Randy Place
729473	November 14, 2008	4112 Madeline Street
729858	November 16, 2008	2821 Santa Teresa Drive
730855	December 1, 2008	1329 Lorry Avenue
730860	December 1, 2008	1333 Lorry Avenue
730126	December 2, 2008	120 Pleasant Street
unknown	December 2, 2008	114 Pleasant Street
unknown	December 10, 2008	1111 Hammond Street
730475	December 11, 2008	3200 Kathy Avenue
730595	December 12, 2008	2038 Vernon Avenue
730594	December 12, 2008	1530 LeMans Lane
730987	December 19, 2008	500 Morton Boulevard
730985	December 20, 2008	1016 Nantucket
730989	December 20, 2008	1011 Tully Road
731035	December 21, 2008	1311 E Street Street
731110	December 27, 2008	620 Paradise Road
731199	December 29, 2008	1147 Rose Avenue
731413	January 4, 2009	1626 Oakwood Drive
731497	January 7, 2009	928 South Street
731647	January 7, 2009	2416 Southridge Drive
731680	January 8, 2009	2609 Palomino Lane
731681	January 8, 2009	2800 Niabell Way
732003	January 13, 2009	2414 Counts Court
731996	January 14, 2009	2409 Counts Court
732106	January 16, 2009	1312 Ensanada Drive
732696	January 25, 2009	2112 Aloha Way
732699	January 25, 2009	1706 W. Rumble Road
732714	January 26, 2009	1002 Douglas Avenue
732711	January 26, 2009	1022 Douglas Avenue
732847	January 29, 2009	622 Chabot Avenue
733011	February 2, 2009	1334 Cypress Avenue
unknown	February 10, 2009	8224 West Grayson Road
733513	February 10, 2009	1813 Clayton Avenue
734197	February 24, 2009	901 Enslin Avenue
734436	March 1, 2009	3116 Clogston Way
734784	March 6, 2009	2700 Marlboro Place
734751	March 7, 2009	1216 Pinetree Lane
734752	March 7, 2009	2028 Riverpine Court
734855	March 10, 2009	201 S. McClure Road
734945	March 11, 2009	2036 Esther Avenue
735296	March 19, 2009	1909 Sage Court
735301	March 19, 2009	1924 Sage Court
735302	March 19, 2009	1924 Sage Court
735651	March 24, 2009	2821 Santa Teresa Drive
735656	March 24, 2009	2028 Applegate Drive



SSO Event ID	State Date	Location
735917	April 1, 2009	1900 Standiford Avenue
736006	April 4, 2009	923 Oxford Way
736043	April 6, 2009	1241 Champ Avenue
736537	April 17, 2009	1217 Roselawn Avenue
736532	April 19, 2009	1928 Oostburg Court
736534	April 19, 2009	2012 Cadzand Court
736535	April 19, 2009	2016 Zeeland Court
736547	April 20, 2009	405 Coldwell Avenue
736904	April 26, 2009	1808 Fairfax Avenue
737055	May 1, 2009	1012 Muriel Avenue
737326	May 11, 2009	2504 Bahia Way
737896	May 22, 2009	601 W. Granger Avenue
738316	May 29, 2009	1829 Manzanita Drive
738404	May 29, 2009	1501 Ensanada Drive
738458	June 2, 2009	1224 Westland Drive
unknown	June 6, 2009	4000 Yosemite Blvd.
unknown	June 11, 2009	822 9th Street
unknown	June 26, 2009	2501 W. Hackett Road
740545	June 28, 2009	617 W. Granger Avenue
740547	June 28, 2009	1912 Hagstrum Court
740549	June 28, 2009	1812 Hagstrum Court
740868	July 2, 2009	1005 Sycamore Avenue
740987	July 12, 2009	405 Riverside Drive
unknown	July 14, 2009	2501 W. Hackett Road
741356	July 15, 2009	1312 Granada Way
741402	July 15, 2009	1408 Palomar Way
741504	July 17, 2009	1109 Salisbury Lane
742497	July 27, 2009	2052 Boulder Creek Drive
742743	August 8, 2009	1412 Solano Court
unknown	August 12, 2009	2030 Evergreen Drive
743087	August 12, 2009	1826 Conifer Drive
743588	August 21, 2009	2921 Rimrock Court
743698	August 24, 2009	1308 Grinnell Street
744547	September 8, 2009	2501 Liberty Court
744548	September 8, 2009	800 9th Street
745166	September 25, 2009	144 Lee Street
745363	October 2, 2009	1500 Floyd Ave.
745354	October 2, 2009	2613 Schulenburg Avenue
745365	October 3, 2009	1600 Floyd Avenue
745420	October 4, 2009	4018 Veranda Way
745421	October 4, 2009	1717 Legend Ct.
745641	October 10, 2009	1805 Applegate Drive
745985	October 17, 2009	625 W. Briggsmore Avenue
728484	October 23, 2009	148 Bonita Circle
746180	October 24, 2009	1212 Ojai Lane
746174	October 24, 2009	1120 Ojai Lane



SSO Event ID	State Date	Location
746170	October 26, 2009	918 Sierra Drive
unknown	October 26, 2009	111 Jones Street
746707	November 10, 2009	301 Lakehead Lane
746937	November 21, 2009	1720 Woolston Way
747003	November 26, 2009	524 Needham Street
747202	November 26, 2009	1438 Kruger Drive
747201	November 29, 2009	1424 Queens Avenue
747357	December 4, 2009	3416 McHenry Avenue
747358	December 4, 2009	3320 McHenry Avenue
747409	December 8, 2009	3800 Windwood Place
747410	December 8, 2009	3733 Windwood Place
747643	December 17, 2009	1937 Coffee Road
747867	December 22, 2009	2307 Oakdale Road
747868	December 22, 2009	2307 Oakdale Road
747919	December 28, 2009	134 Magnolia Avenue
748022	December 29, 2009	3212 Inverness Street
748101	January 1, 2010	2101 Westview Court
748090	January 2, 2010	1432 Bandera Lane
748095	January 2, 2010	2529 Peseadero Place
748099	January 2, 2010	2705 Verano Avenue
748100	January 2, 2010	2613 Verano Avenue
756836	January 4, 2010	3512 Jonna Drive
748178	January 6, 2010	1704 Silvaire Drive
unknown	January 6, 2010	8224 West Grayson Road
748206	January 6, 2010	2013 Bridgewood Way
unknown	January 10, 2010	908 Cheatham Court
748343	January 13, 2010	1541 Morene Way
748963	January 23, 2010	1316 Buccaneer Court
748847	January 24, 2010	604 Duncan Avenue
749067	February 1, 2010	1500 Stetson Avenue
749375	February 12, 2010	1313 Granda Way
749377	February 12, 2010	1408 Falcon Way
749381	February 13, 2010	1920 Lafayette Avenue
749382	February 13, 2010	1832 Lafayette Avenue
749390	February 14, 2010	4100 Coffee Road
749383	February 14, 2010	1013 Athens Avenue
unknown	February 15, 2010	236 N. Riverside Drive
749385	February 15, 2010	637 El Vista Avenue
749462	February 17, 2010	1333 Lorry Avenue
749463	February 17, 2010	1328 Lorry Avenue
749464	February 17, 2010	1613 Duckart Way
749466	February 17, 2010	1513 Duckart Way
749570	February 20, 2010	1136 Springcreek Drive
750204	February 22, 2010	1018 Raube Court
750176	March 4, 2010	515 E. Orangeburg Avenue
unknown	March 7, 2010	1018 Raube Court



SSO Event ID	State Date	Location
751242	March 30, 2010	2419 W. Rumble Road
unknown	April 7, 2010	1111 Hammond Street
751615	April 12, 2010	1009 Roseburg Avenue
751760	April 17, 2010	1513 Pepper Tree Lane
751937	April 23, 2010	1516 East Orangeburg Avenue
751938	April 23, 2010	1620 East Orangeburg Avenue
751939	April 23, 2010	1428 Morene Way
752102	May 2, 2010	1829 Sky Lane Way
752169	May 4, 2010	2812 Bateman Lane
752236	May 5, 2010	3301 Ridgemont Court
752237	May 5, 2010	2801 Ashbrook Court
752328	May 7, 2010	806 Roselawn Avenue
755341	July 20, 2010	3700 Cheyenne Way
755343	July 20, 2010	2105 Cheyenne Way
755416	July 22, 2010	1313 Locke Road
unknown	August 15, 2010	409 Johnson Street
756287	August 23, 2010	645 Jeelu Way
756455	August 26, 2010	138 John Muir Court
757417	October 4, 2010	3801 Tenby Way
757418	October 4, 2010	1425 Clevenger Avenue
757410	October 5, 2010	2709 Palomino Lane
758104	October 13, 2010	601 Zeff Road
757866	October 16, 2010	1320 La Loma Avenue
757868	October 17, 2010	1105 McGuire Drive
758459	November 6, 2010	1146 Orchid Court
unknown	November 9, 2010	950 Oakdale Road
758911	November 23, 2010	3429 Wentworth Court
758914	November 24, 2010	3800 Amigo Drive
759148	December 1, 2010	1300 K Street
759461	December 13, 2010	2509 Jasmine Avenue
759640	December 19, 2010	1240 South Avenue
760436	January 6, 2011	101 North Emerald Avenue
760375	January 6, 2011	1116 Oakdale Road
762017	January 21, 2011	1201 Oakdale Road
762085	January 27, 2011	132 Drake Avenue
762504	February 2, 2011	812 Carmel Drive
762747	February 5, 2011	1113 Snead Drive
762787	February 5, 2011	1101 Avalon Drive
762733	February 5, 2011	1307 Witney Court
762842	February 5, 2011	1307 Witney Court
762728	February 8, 2011	1817 Devonshire Avenue
763197	February 14, 2011	136 John Muir Court
763203	February 14, 2011	114 John Muir Court
764423	March 15, 2011	200 S. Carpenter Road
764550	March 18, 2011	1809 Red Pine Drive
765025	March 30, 2011	801 Ramona Avenue



## Exhibit A

Page 7 of 7

SSO Event ID	State Date	Location
unknown	April 8, 2011	1121 Hammond Street
unknown	April 27, 2011	218 Patricia Lane
765965	April 28, 2011	1615 F Street
766444	May 1, 2011	1709 Mable Avenue
unknown	May 5, 2011	2201 Eicher Avenue
766262	May 5, 2011	3116 Wollam Drive
767292	June 6, 2011	1240 South Avenue
767439	June 10, 2011	1116 Oakdale Road
767440	June 10, 2001	1112 Hilo Lane
768262	July 2, 2011	2633 Portsmouth Drive
768263	July 2, 2011	2609 Portsmouth Drive
768256	July 7, 2011	1505 Vermouth Way
769421	July 26, 2011	2905 Hemminger Way
770396	August 21, 2011	1009 W. Granger Avenue
770395	August 21, 2011	1913 Margate Way
770870	September 6, 2011	1908 Bloxham Street
772176	October 18, 2011	2552 Beatrice Lane
772699	November 2, 2011	3125 Conant Avenue
773279	November 17, 2011	1213 I Street
773607	November 19, 2011	1012 Muriel Avenue
773605	November 20, 2011	701 Auburn Street
773610	November 28, 2011	710 Downey Avenue
774335	December 7, 2011	1213 Chacwick Court
774551	December 20, 2011	1312 Ensanada Drive
775809	December 23, 2011	1317 Palomar Way
775810	January 12, 2012	1408 Peppertree Lane
776576	January 24, 2012	1317 Oakdale Rd
776584	January 27, 2012	444 Maple Street
777049	January 31, 2012	921 Tully Road
777054	February 8, 2012	1212 Ojai Lane
778160	February 24, 2012	1839 Skylane Way
779682	April 3, 2012	1300 K Street
781202	May 30, 2012	142 Lee Street
781771	June 19, 2012	124 Helen Avenue



Exhibit B  
Page 1 of 6

SSO Event ID	State Date	Location
unknown	July 2, 2007	345 Morton Avenue
unknown	July 23, 2007	1500 Phoenix Avenue
656836	September 1, 2007	1010 Amherst Avenue
657867	September 17, 2007	905 Hammond Street
704524	September 23, 2007	712 Tuolumne Blvd.
704469	September 26, 2007	518 Washington Street
706022	October 4, 2007	Madison 617 Street
706787	October 24, 2007	2804 Hemminger Way
706776	October 28, 2007	602 Muir Road
707993	October 29, 2007	1901 Carver Road
708348	November 1, 2007	1513 Peppertree Lane
707485	November 5, 2007	436 McClure Road
707996	November 8, 2007	160 Mark Randy Place
708336	November 22, 2007	601 Duncan Avenue
708345	November 25, 2007	2017 Westview Court
708875	November 30, 2007	1820 Serena Avenue
708876	December 2, 2007	2105 Cheyenne Way
709621	December 3, 2007	1800 Joann Avenue
708988	December 4, 2007	1920 Cindy Avenue
710475	December 13, 2007	109 River Road
710184	December 20, 2007	1310 Muirswood Way
710182	December 20, 2007	1812 Landini Way
710185	December 20, 2007	1804 Kruger Way
710479	December 24, 2007	2017 Girard Avenue
710483	December 25, 2007	1513 Roosevelt Way
710485	December 26, 2007	109 River Road
710484	December 26, 2007	437 Enslen Park Court
756693	January 1, 2008	1212 Valeriewood Way
756694	January 2, 2008	2517 Olympus Court
unknown	January 4, 2008	3200 Kathy Avenue
756831	January 4, 2008	1137 Lillian Drive
756832	January 4, 2008	1209 Ojai Lane
756833	January 4, 2008	3601 Woodbine Drive
756835	January 4, 2008	3409 Woodbine Drive
756695	February 4, 2008	600 Paradise Road
713199	February 15, 2008	2025 Celeste Drive
713092	February 18, 2008	1500 Stetson Avenue
714096	February 26, 2008	1420 Chapala Way
714112	February 26, 2008	1417 Chapala Way
714118	February 26, 2008	2320 Tampico Court
715240	March 3, 2008	2513 Hemminger Way
756697	March 17, 2008	1606 Cindi Avenue
756748	March 17, 2008	1712 Silverwood Avenue
756750	March 17, 2008	1900 Silverwood Avenue
715699	March 26, 2008	1321 Magolia Avenue
unknown	March 31, 2008	2213 Peppermint Dr / 1112 Hilo Lane



SSO Event ID	State Date	Location
756773	March 31, 2008	2213 Peppermint Drive
756774	March 31, 2008	1112 Hilo Lane
716445	April 2, 2008	1928 Cindy Avenue
716072	April 8, 2008	2043 Celeste Drive
716083	April 8, 2008	2045 Celeste Drive
716086	April 8, 2008	1904 Sage Court
716136	April 11, 2008	925 Enslen Avenue
716443	April 18, 2008	546 High Street
756768	April 25, 2008	1920 Lafayette Avenue
716927	May 1, 2008	116 Athens Avenue
756767	May 5, 2008	2617 Jennifer Drive
unknown	May 6, 2008	1340 McHenry Avenue
717537	May 15, 2008	929 Roselawn Avenue
718132	May 24, 2008	1120 Ojai Lane
718133	May 24, 2008	1212 Ojai Lane
718130	May 25, 2008	920 Virginia Avenue
718136	May 26, 2008	1816 Bonanza Way
756770	June 1, 2008	3032 Darlene Lane
756769	June 1, 2008	1301 Satariano Lane
719112	June 7, 2008	807 High Street
719279	June 9, 2008	141 Morton Blvd.
724074	June 27, 2008	2200 San Lucas Court
721564	July 4, 2008	1404 Roosevelt Avenue
722496	July 9, 2008	2509 Springflower Way
722505	July 12, 2008	2904 Debbie Lane
756772	July 16, 2008	3708 Coffee Road
724891	July 19, 2008	620 El Camino Drive
756686	August 4, 2008	2309 Rivera Drive
724577	August 6, 2008	2021 Standiford Avenue
724767	August 14, 2008	126 Modesto Avenue
728227	October 17, 2008	1525 McHenry Avenue
728558	October 18, 2008	1816 Landini Way
728559	October 18, 2008	1804 Kruger Drive
729203	November 1, 2008	160 Mark Randy Place
729209	November 10, 2008	140 Mark Randy Place
729473	November 14, 2008	4112 Madeline Street
729858	November 16, 2008	2821 Santa Teresa Drive
730855	December 1, 2008	1329 Lorry Avenue
730860	December 1, 2008	1333 Lorry Avenue
730126	December 2, 2008	120 Pleasant Street
unknown	December 2, 2008	114 Pleasant Street
730475	December 11, 2008	3200 Kathy Avenue
730594	December 12, 2008	1530 LeMans Lane
730987	December 19, 2008	500 Morton Boulevard
730985	December 20, 2008	1016 Nantucket
730989	December 20, 2008	1011 Tully Road



Exhibit B  
Page 3 of 6

SSO Event ID	State Date	Location
731110	December 27, 2008	620 Paradise Road
731199	December 29, 2008	1147 Rose Avenue
731413	January 4, 2009	1626 Oakwood Drive
731497	January 7, 2009	928 South Street
731647	January 7, 2009	2416 Southridge Drive
731680	January 8, 2009	2609 Palomino Lane
731681	January 8, 2009	2800 Niabell Way
732003	January 13, 2009	2414 Counts Court
731996	January 14, 2009	2409 Counts Court
732106	January 16, 2009	1312 Ensanada Drive
732696	January 25, 2009	2112 Aloha Way
732699	January 25, 2009	1706 W. Rumble Road
732714	January 26, 2009	1002 Douglas Avenue
732711	January 26, 2009	1022 Douglas Avenue
732847	January 29, 2009	622 Chabot Avenue
733513	February 10, 2009	1813 Clayton Avenue
734197	February 24, 2009	901 Enslen Avenue
734436	March 1, 2009	3116 Clogston Way
734784	March 6, 2009	2700 Marlboro Place
734751	March 7, 2009	1216 Pinetree Lane
734752	March 7, 2009	2028 Riverpine Court
734855	March 10, 2009	201 S. McClure Road
734945	March 11, 2009	2036 Esther Avenue
735296	March 19, 2009	1909 Sage Court
735301	March 19, 2009	1924 Sage Court
735302	March 19, 2009	1924 Sage Court
735651	March 24, 2009	2821 Santa Teresa Drive
735656	March 24, 2009	2028 Applegate Drive
735917	April 1, 2009	1900 Standiford Avenue
736006	April 4, 2009	923 Oxford Way
736043	April 6, 2009	1241 Champ Avenue
736537	April 17, 2009	1217 Roselawn Avenue
736532	April 19, 2009	1928 Oostburg Court
736534	April 19, 2009	2012 Cadzand Court
736535	April 19, 2009	2016 Zeeland Court
736547	April 20, 2009	405 Coldwell Avenue
736904	April 26, 2009	1808 Fairfax Avenue
737055	May 1, 2009	1012 Muriel Avenue
737326	May 11, 2009	2504 Bahia Way
737896	May 22, 2009	601 W. Granger Avenue
738316	May 29, 2009	1829 Manzanita Drive
738404	May 29, 2009	1501 Ensanada Drive
738458	June 2, 2009	1224 Westland Drive
unknown	June 6, 2009	4000 Yosemite Blvd.
unknown	June 11, 2009	822 9th Street
740545	June 28, 2009	617 W. Granger Avenue



Exhibit B  
Page 4 of 6

SSO Event ID	State Date	Location
740547	June 28, 2009	1912 Hagstrum Court
740549	June 28, 2009	1812 Hagstrum Court
740868	July 2, 2009	1005 Sycamore Avenue
740987	July 12, 2009	405 Riverside Drive
741356	July 15, 2009	1312 Granada Way
741402	July 15, 2009	1408 Palomar Way
741504	July 17, 2009	1109 Salisbury Lane
742497	July 27, 2009	2052 Boulder Creek Drive
742743	August 8, 2009	1412 Solano Court
743087	August 12, 2009	1826 Conifer Drive
743588	August 21, 2009	2921 Rimrock Court
744547	September 8, 2009	2501 Liberty Court
744548	September 8, 2009	800 9th Street
745363	October 2, 2009	1500 Floyd Ave.
745354	October 2, 2009	2613 Schulenburg Avenue
745365	October 3, 2009	1600 Floyd Avenue
745420	October 4, 2009	4018 Veranda Way
745421	October 4, 2009	1717 Legend Ct.
745641	October 10, 2009	1805 Applegate Drive
746180	October 24, 2009	1212 Ojai Lane
746174	October 24, 2009	1120 Ojai Lane
unknown	October 26, 2009	111 Jones Street
746707	November 10, 2009	301 Lakehead Lane
746937	November 21, 2009	1720 Woolston Way
747003	November 26, 2009	524 Needham Street
747202	November 26, 2009	1438 Kruger Drive
747201	November 29, 2009	1424 Queens Avenue
747358	December 4, 2009	3320 McHenry Avenue
747409	December 8, 2009	3800 Windwood Place
747410	December 8, 2009	3733 Windwood Place
747643	December 17, 2009	1937 Coffee Road
747867	December 22, 2009	2307 Oakdale Road
747868	December 22, 2009	2307 Oakdale Road
747919	December 28, 2009	134 Magnolia Avenue
748022	December 29, 2009	3212 Inverness Street
748101	January 1, 2010	2101 Westview Court
748090	January 2, 2010	1432 Bandera Lane
748095	January 2, 2010	2529 Peseadero Place
748099	January 2, 2010	2705 Verano Avenue
748100	January 2, 2010	2613 Verano Avenue
756836	January 4, 2010	3512 Jonna Drive
748178	January 6, 2010	1704 Silvaire Drive
748206	January 6, 2010	2013 Bridgewood Way
unknown	January 10, 2010	908 Cheatham Court
748343	January 13, 2010	1541 Morene Way
748963	January 23, 2010	1316 Buccaneer Court



SSO Event ID	State Date	Location
748847	January 24, 2010	604 Duncan Avenue
749067	February 1, 2010	1500 Stetson Avenue
749375	February 12, 2010	1313 Granda Way
749377	February 12, 2010	1408 Falcon Way
749381	February 13, 2010	1920 Lafayette Avenue
749382	February 13, 2010	1832 Lafayette Avenue
749390	February 14, 2010	4100 Coffee Road
749383	February 14, 2010	1013 Athens Avenue
unknown	February 15, 2010	236 N. Riverside Drive
749385	February 15, 2010	637 El Vista Avenue
749462	February 17, 2010	1333 Lorry Avenue
749463	February 17, 2010	1328 Lorry Avenue
749464	February 17, 2010	1613 Duckart Way
749466	February 17, 2010	1513 Duckart Way
749570	February 20, 2010	1136 Springcreek Drive
750204	February 22, 2010	1018 Raube Court
750176	March 4, 2010	515 E. Orangeburg Avenue
unknown	March 7, 2010	1018 Raube Court
751242	March 30, 2010	2419 W. Rumble Road
unknown	April 7, 2010	1111 Hammond Street
751615	April 12, 2010	1009 Roseburg Avenue
751760	April 17, 2010	1513 Pepper Tree Lane
751937	April 23, 2010	1516 East Orangeburg Avenue
751938	April 23, 2010	1620 East Orangeburg Avenue
751939	April 23, 2010	1428 Morene Way
752102	May 2, 2010	1829 Sky Lane Way
752169	May 4, 2010	2812 Bateman Lane
752236	May 5, 2010	3301 Ridgemont Court
752237	May 5, 2010	2801 Ashbrook Court
752328	May 7, 2010	806 Roselawn Avenue
755341	July 20, 2010	3700 Cheyenne Way
755343	July 20, 2010	2105 Cheyenne Way
755416	July 22, 2010	1313 Locke Road
unknown	August 15, 2010	409 Johnson Street
756287	August 23, 2010	645 Jeelu Way
756455	August 26, 2010	138 John Muir Court
757417	October 4, 2010	3801 Tenby Way
757418	October 4, 2010	1425 Clevenger Avenue
757410	October 5, 2010	2709 Palomino Lane
758104	October 13, 2010	601 Zeff Road
757866	October 16, 2010	1320 La Loma Avenue
757868	October 17, 2010	1105 McGuire Drive
758459	November 6, 2010	1146 Orchid Court
unknown	November 9, 2010	950 Oakdale Road
758911	November 23, 2010	3429 Wentworth Court
758914	November 24, 2010	3800 Amigo Drive



Exhibit B  
Page 6 of 6

SSO Event ID	State Date	Location
759148	December 1, 2010	1300 K Street
759461	December 13, 2010	2509 Jasmine Avenue
759640	December 19, 2010	1240 South Avenue
760436	January 6, 2011	101 North Emerald Avenue
760375	January 6, 2011	1116 Oakdale Road
762017	January 21, 2011	1201 Oakdale Road
762085	January 27, 2011	132 Drake Avenue
762504	February 2, 2011	812 Carmel Drive
762747	February 5, 2011	1113 Snead Drive
762787	February 5, 2011	1101 Avalon Drive
762728	February 8, 2011	1817 Devonshire Avenue
763197	February 14, 2011	136 John Muir Court
763203	February 14, 2011	114 John Muir Court
764423	March 15, 2011	200 S. Carpenter Road
764550	March 18, 2011	1809 Red Pine Drive
765025	March 30, 2011	801 Ramona Avenue
unknown	April 27, 2011	218 Patricia Lane
765965	April 28, 2011	1615 F Street
766444	May 1, 2011	1709 Mable Avenue
unknown	May 5, 2011	2201 Eicher Avenue
766262	May 5, 2011	3116 Wollam Drive
767292	June 6, 2011	1240 South Avenue
767439	June 10, 2011	1116 Oakdale Road
767440	June 10, 2001	1112 Hilo Lane
768262	July 2, 2011	2633 Portsmouth Drive
768263	July 2, 2011	2609 Portsmouth Drive
768256	July 7, 2011	1505 Vermouth Way
769421	July 26, 2011	2905 Hemminger Way
770396	August 21, 2011	1009 W. Granger Avenue
770395	August 21, 2011	1913 Margate Way
770870	September 6, 2011	1908 Bloxham Street
772176	October 18, 2011	2552 Beatrice Lane
772699	November 2, 2011	3125 Conant Avenue
773279	November 17, 2011	1213 I Street
773607	November 19, 2011	1012 Muriel Avenue
773605	November 20, 2011	701 Auburn Street
773610	November 28, 2011	710 Downey Avenue
774335	December 7, 2011	1213 Chacwick Court
774551	December 20, 2011	1312 Ensanada Drive
775809	December 23, 2011	1317 Palomar Way
775810	January 12, 2012	1408 Peppertree Lane
776576	January 24, 2012	1317 Oakdale Rd
777054	February 8, 2012	1212 Ojai Lane
778160	February 24, 2012	1839 Skylane Way
779682	April 3, 2012	1300 K Street
781771	June 19, 2012	124 Helen Avenue